


**Service of Process
Transmittal**

 02/25/2013
 CT Log Number 522196452

TO: William Woodbury, Asst. VP & Asst. General Counsel
 AUTO-OWNERS INSURANCE COMPANY
 6101 Anacapi Blvd.
 Lansing, MI 48917

RE: Process Served in Tennessee

FOR: Auto-Owners Insurance Company (Domestic State: MI)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION:	Jaime Beahn, Pltf. vs. Auto Owners Insurance Company, Dft.
DOCUMENT(S) SERVED:	Letter, Summons, Complaint, Oath
COURT/AGENCY:	Sevier County Circuit Court, TN Case # 13CV85IV
NATURE OF ACTION:	Breach of insurance contract
ON WHOM PROCESS WAS SERVED:	CT Corporation System, Knoxville, TN
DATE AND HOUR OF SERVICE:	By Certified Mail on 02/25/2013 postmarked on 02/21/2013
JURISDICTION SERVED:	Tennessee
APPEARANCE OR ANSWER DUE:	Within 30 days after service of the summons, exclusive of the date of service
ATTORNEY(S) / SENDER(S):	Steven E. Marshall Law Office of Steven E. Marshall, P.C. 1105 Blanton Drive Sevierville, TN 37862 865-428-3556
REMARKS:	Process served/received by the Insurance Commissioner on February 20, 2013, and received by CT Corporation on February 21, 2013.
ACTION ITEMS:	CT has retained the current log, Retain Date: 02/25/2013, Expected Purge Date: 03/02/2013 Image SOP Email Notification, William Woodbury woodbury.bill@aoihs.com
SIGNED:	CT Corporation System
PER:	Amy McLaren
ADDRESS:	800 S. Gay Street Suite 2021 Knoxville, TN 37929-9710
TELEPHONE:	800-592-9023

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Information displayed on this transmittal is for CT Corporation's record keeping purposes only and is provided to the recipient for quick reference. This information does not constitute a legal opinion as to the nature of action, the amount of damages, the answer date, or any information contained in the documents themselves. Recipient is responsible for interpreting said documents and for taking appropriate action. Signatures on certified mail receipts confirm receipt of package only, not contents.

IN THE CIRCUIT COURT FOR SEVIER COUNTY, TENNESSEE

JAIME BEAHM
1524 Pilgrim Way
Sevierville, TN 37862

Plaintiff

vs.

CASE NO. 13 cv-85-IV

AUTO OWNERS INSURANCE COMPANY
2035 Lakeside Centre Way, Suite 190
Knoxville, TN 37930

Defendant

CIRCUIT COURT
FILED
2013 FEB 15 AM 8:16
RITA D. ELLISON, CLERK
SEVIER COUNTY, TN

COMPLAINT FOR BREACH OF CONTRACT

COMES now the Plaintiff, by and through counsel, and for cause of action against the Defendant, Auto Owners Insurance Company, would show the Court as follows:

1. The Plaintiff is a citizen and resident of Sevier County, Tennessee, residing at 1524 Pilgrim Way, Sevierville, TN 37862.
2. The Defendant, Auto Owners Insurance Company, is an insurance company licensed in the State of Tennessee, doing business at 2035 Lakeside Centre Way, Suite 190, Knoxville, Tennessee 37930-2609 and may be served through the Commissioner of Insurance.
3. Plaintiff contracted with Defendant, Auto Owners Insurance Company, to provide her with homeowners insurance under Policy No. **20-827432-00**.
4. In July of 2007, the Plaintiff incurred a fire loss at her home.
5. The Defendant, Auto Owners Insurance Company, made payments on the claim filed by the Plaintiff pursuant to the insurance contract.

6. Certain repairs had to be made to the Plaintiff's home, including repairs to the plumbing system, specifically, the drainage system.

7. The Defendant selected any and all service providers to make the repairs on the Plaintiff's home, specifically, the Defendant employed James Randall White d/b/a Construction Consulting & Management to make repairs to the plumbing.

8. James Randall White negligently failed to reconnect the Plaintiff's drainage system causing raw sewage to drain underneath the Plaintiff's house.

9. Plaintiff avers that the Defendant, Auto Owners Insurance Company, breached its contract with Plaintiff in the following respects: (1) Failing to insure that James Randall White had the ability to make the repairs necessary. (2) Failing to supervise James Randall White's work. (3) Failing to inspect James Randall White's work. (4) Failing to make sure that the damages which led to the underlying claim were adequately repaired.

10. Plaintiff avers that the failures of the Defendant, Auto Owners Insurance Company, constitute a breach of the insurance contract between the Plaintiff and Defendant.

11. Plaintiff avers that the breach of contract by the Defendant was a proximate cause of the damages complained of herein

12. As a direct and proximate result of the breach of contract by the Defendant in this case, that Plaintiff has been damaged by losing the use of her home. Further, the Plaintiff has been damaged by incurring necessary rental expenses for alternate housing. The Plaintiff has been further damaged by suffering mold damage to her property making it unusable. Finally, Plaintiff has been severely inconvenienced by the loss of use of her

home.

13. The losses and damages complained of herein are and will be ongoing continuing injuries to the Plaintiff and her property.

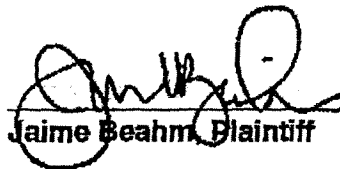
WHEREFORE, Plaintiff prays:

1. That process issue and be served upon the Defendant, Auto Owners Insurance Company, and that it be made to answer thereto, but their oath to the Answer is expressly waived;

2. That upon a hearing of this cause that the Plaintiff be awarded all damages proven at trial, including but not limited to loss of use of her home, rental cost of alternate housing, and cost of remediation of the faulty repairs.


3. Plaintiff demands a jury to try the issues joined herein.

4. For further and general relief.


Jaime Beahm, Plaintiff

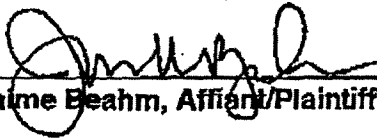
RESPECTFULLY submitted, this the 12th day of February, 2013.

LAW OFFICE OF STEVEN E. MARSHALL, P.C.

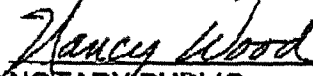

Steven E. Marshall, BPR # 009813
Attorney for Plaintiff
1105 Blanton Drive
Sevierville, TN 37862
(865) 428-3556

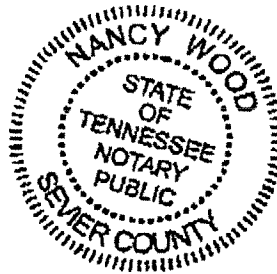
OATH**STATE OF TENNESSEE
COUNTY OF SEVIER**

Jaime Beahm, after having been duly sworn in accordance with law, states that the averments contained in the foregoing Complaint are true and correct to the best of her knowledge, information and belief, and that the same are not made out of levity, but in sincerity and truth, and for the causes set forth therein.


Jaime Beahm, Affiant/Plaintiff

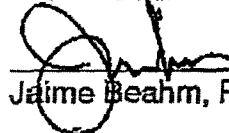
SWORN TO AND SUBSCRIBED before me
this the 13th day of February, 2013.


NOTARY PUBLIC
My Commission Expires: 6-30-15

**COST BOND**


We, the undersigned, do hereby acknowledge ourselves as being liable for the costs of this action.

PRINCIPAL:


Jaime Beahm, Plaintiff

SURETY:

LAW OFFICE OF STEVEN E. MARSHALL, P.C.


Steven E. Marshall
Attorney for Plaintiff

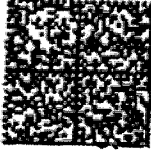
State of Tennessee
Department of Commerce & Insurance
500 James Robertson Parkway
Financial Affairs - Analytical Unit
Nashville, TN 37243

CERTIFIED MAIL



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FIRST CLASS



UNITED STATES POSTAGE
02 1M
\$06.31⁰
0004282628 FEB 21 2013
MAILED FROM ZIP CODE 37243

7012 1010 0002 9223 7939 02/20/2013
AUTO OWNERS INSURANCE COMPANY
800 S. GAY ST., STE. 2021, K C T CORP.
KNOXVILLE, TN 37929-8710